

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BISOUS BISOUS LLC,

Plaintiff,

v.

THE CLE GROUP, LLC,
BISOU UPTOWN MANAGER, LLC, and
BISOU LP HOLDINGS, LLC,

Defendants.

Case No. 3:21 CV01614-B

PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff Bisous Bisous LLC (“Bisous Bisous” or “Plaintiff”) moves for an unopposed extension of time to respond to Defendants The Cle Group, LLC (“The Cle Group”), Bisou Uptown Manager, LLC (“Bisou Uptown Manager”), and Bisou LP Holdings, LLC (“Bisou LP Holdings”)’s (collectively, “Defendants”) Counterclaims to Plaintiff’s Second Amended Complaint (Dkts. 81–83) and respectfully shows the Court as follows:

1. On October 4, 2021, the Court granted Plaintiff’s Motion for Leave to File an Amended Complaint (Dkt. 72) and the Clerk of Court entered Plaintiff’s Second Amended Complaint as Dkt. 73. Pursuant to the Court’s Order dated October 26, 2021 granting Defendants an extension of time to file an answer to Plaintiff’s Second Amended Complaint (Dkt. 80), The Cle Group, Bisou Uptown Manager, and Bisou LP Holdings each filed an Answer and Counterclaims to the Second Amended Complaint on October 29, 2021 (Dkts. 81–83) (the “Counterclaims”).

2. Plaintiff's response to the Counterclaims is currently due on November 19, 2021.

Plaintiff and Defendants have agreed to mediate all issues in this action before the Circuit Mediator for the United States Court of Appeals for the Fifth Circuit on December 3, 2021. In light of the pending mediation, Plaintiff requests a 30 (thirty) day extension of its current deadline to answer, move, or otherwise respond to the Counterclaims to and including December 20, 2021.¹ Counsel for Defendants has agreed to Plaintiff's requested extension. The requested extension will not affect any other deadlines set in the Scheduling Order.

Relief Requested

Bisous Bisous respectfully seek an extension of time for the deadline set forth above.

The requested extension is agreed upon by Plaintiff and Defendants.

¹ Thirty days from the current November 19, 2021 deadline falls on Sunday, December 19. Under Fed. R. Civ. P. 6, the proposed extended deadline will be Monday, December 20, 2021.

Respectfully submitted,

FISH & RICHARDSON P.C.

Dated: November 18, 2021

By: /s/ David B. Conrad

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Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

I hereby certify that on November 11, 2021, counsel for Plaintiff Bisous Bisous LLC conferred with Kenneth P. Kula, counsel for Defendants, regarding the instant motion for an extension of time, and Mr. Kula advised that Defendants do not oppose the relief sought in Bisous Bisous's motion.

Dated: November 18, 2021

/s/ David B. Conrad

David B. Conrad

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 18, 2021, a true and correct copy of the foregoing document has been filed with the clerk of court for the U.S. District Court, Northern District of Texas and served on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

Dated: November 18, 2021

/s/ David B. Conrad

David B. Conrad